

## ATTACHMENT A

### Remarks

By this Amendment, a dependency correction has been made to claim 3, while claims 1-2 have been revised somewhat for better conformance with US practice. It is submitted that the present application is in condition for allowance for the following reasons.

In the Claim Rejections - 35 USC § 112 section, claims 3-4 were rejected for being indefinite. By this Amendment, the dependency of claim 3 (and hence claim 4) has been changed from independent claim 1 to independent claim 2 to overcome the noted antecedent basis problem. In addition, some minor changes have been made in independent claims 1 and 2 to better conform these claims to US practice concerning complete identification of elements and antecedent basis.

In the *Claims Rejection* – 35 USC § 102 section, independent claims 1 and 2, and claims 3-7 variously dependent therefrom, were rejected as being anticipated by the Rohlfing patent. However, for the following reasons, it is submitted that independent claims 1 and 2 and claims 3-7 dependent therefrom are all allowable over this reference.

As made clear in the specification and claims, the present invention is directed to a calibration method for a lens system for an on-site camera which makes use of intrinsic characteristics of the lens system which are initially determined using a different/reference camera. In particular, the present invention uses one/reference camera during the first (a) stage for a lens calibration, and a second/different camera

during the second (b) stage which makes use of the lens calibration obtained with the first camera.

The Rohlfing patent discloses a method for performing a camera lens calibration. This method is performed by comparing the real (camera) image of a real environment provided by the camera lens system with a virtual image produced by a computer of that same environment. Later, that the comparison information is used with that same camera and lens system.

From the above, it is evident that the procedures and objects of the present invention and of the Rohlfing patent are different. In the present invention, parameters of the lens system are initially determined using a reference camera, so that later use of the lens system on a different/on-site camera can be suitably made without a new calibration of the lens system. In the Rohlfing patent, the lens system is always used with the same camera; and the comparison is with a virtual image and not any different camera using the same lens system as claimed in both claims 1 and 2. It will thus be noted that there is nothing disclosed in the Rohlfing patent about using a calibration of one lens system on one camera when the lens system is subsequently used on a second camera.

With reference to page 7, lines 13-26 of the present application, it will thus further be appreciated that an "extrinsic calibration" (known as LCS for "Lens Camera Setting") which is used in the Rohlfing patent is different from an "intrinsic calibration" of the present invention which is "transposable from camera to another" (see page 7, line 25). This difference between the present invention and the Rohlfing patent is also made clear by the recitation at page 2, lines 14-19 where it is clearly indicated that it is an

object of the present invention to simplify the calibration operations to be performed on site each time that a "new camera" is used with the known lens system.

Therefore, in view of the differences noted above, it is submitted that both independent claims 1 and 2 are neither disclosed nor made obvious by the Rohlfing patent so that both claims 1 and 2 are now allowable. For at least these same reasons, it is submitted that dependent claims 3-7 are also allowable.

The remaining references which were cited but not applied have been reviewed but are not believed to be pertinent to the patentability of the present invention.

For all of the foregoing reasons, it is submitted that the present application is in condition for allowance and such action is solicited.